

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GLEN CRAIG

Plaintiff,

VS.

UNIVERSAL MUSIC GROUP, INC.,
KINGSID VENTURES, LTD., and ESTATE OF
RILEY B. KING,

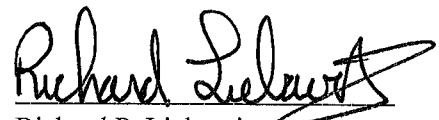
Defendants.

DECLARATION OF RICHARD P. LIEBOWITZ

I, Richard P. Liebowitz, hereby declare, under the penalty of perjury as follows:

1. I am a partner with the firm of Liebowitz Law Firm PLLC, and counsel to Plaintiff Glen Craig. I am a member in good standing of the bar of the state of New York.
2. I submit this declaration in opposition to Defendants' Motion for Summary Judgment and Partial Summary Judgment.
3. I am fully familiar with the facts set forth herein and respectfully submit this declaration.
4. Excerpts from the deposition testimony of Ryan Null, a Photo Coordinator in Creative Services at UMGI is attached hereto as Exhibit A.
5. Excerpts from the deposition testimony of Caroline Frilot, a VP of Royalty Operations for Artists and Copyright, at UMGI is attached hereto as Exhibit B.
6. A Cease & Desist letter (Bates No. GC 00057-GC00061) sent on September 18, 2014 by Craig's former attorney, Benjamin S. Thompson, Esq. to Universal Music Group and Estate is hereby attached as Exhibit C.
7. Excerpts from the deposition testimony of Louise Laverne Toney, a trustee for the Estate is attached hereto as Exhibit D.

Executed this 16th day of July, 2018

A handwritten signature in black ink, appearing to read "Richard Liebowitz", with a stylized flourish at the end.

Richard P. Liebowitz
Liebowitz Law Firm PLLC